

APR 25 2013
9/20IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIAHENRY UNSELD WASHINGTON
PLAINTIFFV.
JAMES L GRACE
Defendants et alCIVIL ACTION NO. 4:08-CV-1283 DEPUTY CLERK
{ PLAINTIFF DECLARATION IN SUPPORT OF PLAINTIFF
> OBJECTIONS, MOTION FOR REVIEW OF RECOMMENDATIONS
> AND REPORTS OF MAGISTRATE JUDGES ADDRESSING CASE
> DISPOSITIVE MOTIONS
> PER COURT ORDER, 4-9-13I, HENRY UNSELD WASHINGTON, AM THE PLAINTIFF IN THE ABOVE CAPTION:
HEREBY DECLARES:

1. N.B. FOR THE SAKE OF CLARITY, THROUGHOUT THE PLAINTIFF MOTION FOR OBJECTIONS FOR REVIEW OF RECOMMENDATIONS AND REPORTS OF MAGISTRATE JUDGES ADDRESSING CASE DISPOSITIVE MOTIONS, PER COURT ORDER 4-9-13, AND ALL ATTACHED DOCUMENTS; ALL PRIOR PLEADINGS, I AM QUOTING DEFENDANTS WHEN I SAY TO THE COURT, DEFENDANTS DECLARED; BASED ON DEFENDANTS OWN WORDS; ACTING IN CONCERT; ACCORDING TO DEFENDANTS, ETC. THEREFORE, I AM NOT MAKING CONCLUSORY CLAIMS BY REPEATING VERBATIM WHAT DEFENDANTS TOLD ME. IF THERE'S ANY CONCLUSION IN THEIR OWN STATEMENTS, THEN DEFENDANTS OWN WORDS ARE THE SOURCE, AND WHEN INTERPRETED CORRECTLY NOTHING CONCERNING PLAINTIFF HAVING REPEATED DEFENDANTS WORDS VERBATIM CAN BE CONTROVERTED TO IMPLY, INFER OR IN ANY WAY MEAN A CONCLUSORY CLAIM
2. I AM NEAR 70-YEARS OF AGE; IN A STATE OF RAPID-N-VERY PROGRESSIVE FAILING HEALTH; ON A DAILY BASIS I AM IN EXCRUCIATING PAIN-N-DISCOMFORT NON-STOP, I AM WEAK-N-STICKLY, LACK STRENGTH-N-ENERGY; SUFFERING WITH DEMENTIA; I AM 50-POUNDS UNDER MY NORMAL WEIGHT, DUE TO MY BEING DENIED MEDICAL TREATMENT FOOD, BASIC HUMAN NEEDS. I HAVE NO WAY TO DEFEND MYSELF SO SCI-GREENE DOC STAFF-N-MEDICAL PROFESSIONALS WHOM ARE ANGRY WITH ME FOR CITING THEM IN THIS LAW SUIT, THEY PHYSICALLY-N-SEXUALLY ABUSE ME; ACCORDING TO THEM, THEY ARE DOING THESE THINGS TO ME TO PENALIZE ME FOR SUING THEM; I HAVE NO WAY OF STOPPING THESE ATTACKS OR PREVENTING THE NEXT ONE FROM OCCURRING
3. I AM NOT AN ARTICULATE PERSON SO I AM OFTEN MISUNDERSTOOD, I HAVE NEVER GIVEN A DEPOSITION BEFORE, AND BY MY HAVING DEMENTIA, AND DEFENDANT DENYING ME THE REMAINDER OF MY RELIGIOUS-N-LEGAL MATERIAL MAKES IT NEAR IMPOSSIBLE FOR ME TO GIVE AN ACCURATE ACCOUNT OF WHAT OCCURRED IN THIS CASE; SO I AM BOTH AFRAID I'LL SAY THE WRONG THING, AND I AM RARELY TO GIVE THIS DEPOSITION. . . HOWEVER, SCI-GREENE DOC STAFF-N-MEDICAL PROFESSIONALS ALWAYS KNOW WHAT THE CONTENTS OF MY INCOMING LEGAL MAIL PRIOR TO IT BEING PLACED IN MY HAND, THEY TOLD ME ABOUT MY BEING SCHEDULED FOR AN UP COMING VIDEO CONFERENCE TO GIVE A DEPOSITION, AND THEY TOLD ME THERE WAS GOING TO BE HELL TO PAY, AND WHAT ENDED UP ARE LISTED BELOW
4. I WAS PLACED IN A CELL DUE TO ITS LOCATION CAUSES ^{MFTO} EXPERIENCE AN INCREASE OF THUNDEROUS HEARTBEAT, CHEST PAIN, DIFFICULTY BREATHING, SWALLOWING, SPEAKING, RISING TO MY FEET, REMAINING UPRIGHT, CONCENTRATING, MEMORY LOSS; COLLAPSING 25-40 TIMES DAILY; AND MY BODY HAS MORE THAN ONE PERMANENT SCARS FROM MY STRIKING MY HEAD, NECK, RIBS, SPINE, LEGS, ARMS, CHEST AGAINST THE STEEL OBJECTS, E.G. SINK, COMMODE, TABLE, STOOL, BED FRAME, DOOR, AND CONCRETE WALL-N-FLOOR. THIS IS STILL OCCURRING TODAY! DONE FOR NON-MEDICAL REASONS
5. ON MORE THAN ONE OCCASION WATER FROM THE SEWER FLOWED INTO MY CELL NON-STOP; ONE OF THOSE OCCASIONS IT FLOWED IN FOR MORE THAN TWO STRAIGHT WEEKS
6. I WAS REMOVED FROM MY CELL, TAKEN OUT THE VIEW OF CAMERA WHERE 5 DOC STAFF MEMBERS SPAT IN MY FACE, GROUND THE KNUCKLES INTO MY SKULL, DROVE A KNEE INTO MY SPINE, HIP-N-SOLAR PLEXUS.
7. DENIED FOOD FOR LONG PERIODS OF TIME; AND TO DATE I AM HUNGRY BEYOND WORDS, ALWAYS BEGGING FOR FOOD WHICH I NEVER RECEIVE. BECAUSE EACH TRAY OF FOOD I AM GIVEN DOES ^{NOT} HAVE THE SAME AMOUNT OF FOOD ALL OTHER RHU INMATES; AT THIS EXACT MOMENT DUE TO THE LACK OF FOOD I 50-POUND BELOW MY NORMAL WEIGHT, SO WEAK I STRUGGLE TO COMPLETE THIS DOCUMENT
8. COLLECTORS ITEMS WORTH \$10-15,000 EACH, SEVERAL OTHER VALUABLE WERE DESTROYED
9. ALL WEEK LONG I'VE BEEN SICK, BEBBING FOR EMERGENCY MEDICAL TREATMENT THE ENTIRE WEEKEND, THE OTHER RHU INMATES ARE SEEN BY THE PAC THE NEXT DAY AT THEIR CELL DOOR. I AM SICK-N-IN PAIN
- N.B. NOT NECESSARILY IN THAT CHRONOLOGICAL ORDER, BUT JUST A FEW OF THE ABUSE I AM BEING SUBJECT TO BECAUSE I DID LAUGHED ANSWER QUESTIONS AT BOTH VIDEO CONFERENCES. AGAIN THEY DID SO BECAUSE I DID ANSWER QUESTION-N-I RESPONDED TO QUESTIONS

10. IN LIGHT OF ALL OF THE ABOVE GOING ON I DOUBTLESSLY, FAX#04125108 PAGE 12 OF 20 CONFERENCE, I AM DOING EVERYTHING IN MY POWER TO GIVE DEFENDANTS A DEPOSITION WITH THE INVOLVEMENT OF THE COURT, I.E. PRIOR TO THE FIRST VIDEO CONFERENCE ON 1-28-13, I REPORTED THE ONGOING ABUSES TO THE WARDEN, BOTH DEPUTY WARDEN, WARDEN'S ASSISTANT; ADMINISTRATIVE OFFICER 2; SECURITY CAPTAIN, RHU CAPTAIN-N-LIEUTENANTS, HEARING EXAMINER, COUNSELOR, PSYCHOLOGISTS, MAJORS; AND I PROVIDED THE DEFENDANTS ATTORNEY, RAYMOND W. DORIAN, VIA FAX AN ACCOUNT OF THE ABUSES I WAS UNDERGOING, AND THE NAMES-N-SPECIFICS OF THE DOC STAFF WHOM WERE ACTING IN CONCERT WITH SCI-GREENE DOC STAFF-N-MEDICAL PROFESSIONALS WHO WERE CITED AS DEFENDANTS IN THIS LAWSUIT SUIT NOW COMMITTING THE SAME ABUSES CITED IN THIS LAWSUIT
11. WHILE ENROUTE TO THE VIDEO CONFERENCE ON 3-26-13, A SCI-GREENE COMMANDING OFFICER DECLARED TO ME IF SAY ANYTHING ABOUT ANY DOC STAFF MEMBER-OR MEDICAL PROFESSIONALS NO MATTER WHERE THEY ARE EMPLOYED HE WOULD FRACATURE MY SKULL; THESE WORDS WERE FOLLOWED BY THE ACTIONS OF THIS COMMANDING STRIKING ME WITH HIS FOOT, CAUSING A DEEP BRUISE THAT LASTED FOR MORE THAN TWO WEEKS, THIS SAME COMMANDING HAVING PLACED HIS HANDS ON ME MORE THAN ONCE IN THE PASS; NOW AFTER HAVING STRUCK ME WITH HIS FOOT ONLY MOMENTS EARLIER CAME TO THE VIDEO CONFERENCE STOOD AT MY BACK LESS THAN THREE FEET AWAY HOLDING A THREE FOOT BATON IN HAND, CAUSING ME TO BE IN A STATE OF [REDACTED] FEAR THAT MY LIFE WAS IN IMMINENT DANGER OF ACTUAL IRREPARABLE INJURY, OR EVEN DEATH.
12. I AM AN OLD WEAK-N-SICK MAN. I CANNOT PROTECT MYSELF. . . I'VE DONE EVERYTHING WITHIN MY POWER TO GIVE DEFENDANTS A DEPOSITION. . . NOT ONCE DID I REFUSE TO COMPLY TO A COURT ORDER, AND PRIOR TO DISTRICT COURT INVOLVEMENT, DURING THE FIRST VIDEOCONFERENCE, IT WAS THE DEFENDANTS ATTORNEY WHO REPORTED TO THREATS-N-TAUNTS; REPEATING THE SAME QUESTIONS-N-BOASTING ABOUT HAVING MY LAWSUIT DISMISSED, MY NOT WANTING TO SAY THE WRONG THING I ACCEPTED IT, THEN HE ENDED THE VIDEO CONFERENCE; NOR DID I REFUSE TO RESPOND TO QUESTIONS DURING THE VIDEOCONFERENCE, DEFENDANTS ATTORNEY, RAYMOND DORIAN ONCE AGAIN REPORTED TO TAUNTING-N-THREATS; THEN ENDING THE VIDEOCONFERENCE, I DID ALL I COULD TO EXPLAIN TO HIM THAT IF I SAY ANYTHING I WOULD BE INSTANTLY ATTACKED, BY THIS COMMANDING DOC OFFICER, WHO WEIGH APPROXIMATELY 400-POUNDS, HAVING PLACE HANDS ON ME IN THE PASS, AND ONLY MOMENTS EARLIER STRUCK ME WITH HIS FOOT, NOW STANDING LESS THAN 3-FEET AWAY WITH A RIGID STICK IN HAND
13. IN EACH OF THE FOREGOING INSTANCE, THESE DEFENDANTS ACTING CONCERT BY PERSONALLY PARTICIPATING IN THE ONGOING ABUSES, SOME GAVE DIRECT ORDERS TO SCI-GREENE DOC STAFF-N-MEDICAL PROFESSIONALS UNDER THEIR COMMAND; THESE SAME SCI-GREENE DOC STAFF-N-MEDICAL PROFESSIONALS OPENLY DECLARE THAT THEIR ABUSES ARE BEING COMMITTED PER THE ORDERS OF THE COMMANDING OFFICERS, WHOM ARE CITED, AND WHOM WERE CITED AS DEFENDANTS IN THIS LAWSUIT, ANOTHER EXACT SAME SCI-GREENE DOC STAFF-N-MEDICAL PROFESSIONALS ARE CONSISTENTLY DECLARING FROM THEIR OWN MOUTH, PRIOR TO-N-SUBSEQUENTLY TO THE ACTS OF ABUSES, THAT THEIR REASONS FOR DOING SO IS TO PENALIZE ME, FOR MY HAVING FILED THIS LEGAL ACTION- WHEREBY ACTUALLY BEING PERSONALLY INVOLVED, HAVING KNOWLEDGE, CONSENT, ACQUIESCE, AIDED-N-ABETTED, DIRECTED, INSTRUCTED, ORCHESTRATED, PARTICIPATED-N-ACTED IN CONCERT WITH NON PARTIES TO THIS LAWSUIT, TO SEXUALLY-N-PHYSICALLY ASSAULT PLAINTIFF, OPEN-N-REFUSED ALL PLAINTIFF OUT GOING MAIL, DENY FOOD, SHOWERS, THE REMAINDER OF MY RELIGIOUS-N-LEGAL MATERIAL, OUTDOOR EXERCISE, ACCESS TO RELIGIOUS PRACTICE, AND MEDICAL TREATMENT EVEN IF IT CAUSE MY DEATH. . . BASED ON THEIR OWN WORDS, THEIR ACTIONS WERE TAKEN AGAINST ME ARE DIRECTLY RELATED TO MATTERS CONCERNING DEFENDANTS IN THIS LAWSUIT, AND MATTER IN QUESTION THAT OCCURRED IN THE MIDDLE DISTRICT-N-SCI-GREENE DEFENDANTS WHOM ARE STILL DEFENDANTS IN THIS LAWSUIT. . . IN THIS INSTANCE, THE NON PARTIES OR THOSE WHOM WERE DEFENDANTS ARE CURRENTLY ABUSING ME, ACCORDING TO THEIR OWN WORDS, ARE DOING SO TO SUPPORT THOSE WHO'RE STILL DEFENDANTS, AND WORK UNDER THESE DEFENDANTS COMMAND. THESE ARE NOT ISSUES THAT TOOK PLACE PRIOR TO EVENTS SET FORTH IN THIS ACTION. . . BECAUSE I FILED THIS LAWSUIT CONCERNING MATTERS THAT OCCURRED IN THE MIDDLE DISTRICT THE SCI-GREENE DOC STAFF-N-MEDICAL PROFESSIONALS TO DATE CONTINUE THE SAME RELATED ABUSES TO PENALIZE ME FOR THIS INSTANT LAWSUIT, WHEREBY BOTH, THE DEFENDANTS-N-WHOM WERE DEFENDANTS-N-NON PARTIES ARE ACTING IN CONCERT
14. I TO DATE HAVE WILLFULLY ACTED IN GOOD FAITH IN MY ATTEMPT TO PROVIDE DEFENDANTS A DEPOSITION, EVEN AT THE EXPENSE OF MY BEING ABUSED SEXUAL-N-PHYSICALLY, MORE THAN ONCE, SO IT'S NOT TRUE THAT I AM REFUSING TO DO SO; DEFENDANTS OWN ACTIONS ARE PREVENTING IT, SEE DECLARATION #2 OF HENRY UNSELL WASHINGTON, DATED 3-31-13, PAGE C AT 7, 8; PAGE D AT 10; PAGE E-F AT 12, 13. . . IS IT TOO MUCH FOR A SICKLY-N-OFFENSELY OLD MAN TO BE PROVIDED PROTECTION, ESPECIALLY WHEN IT'S FREELY PROVIDED TO 18-45 YEAR OLDS HAVING STRENGTH-N-IN GOOD HEALTH. I AM BESUGING THIS COURT TO HELP ME, I HAVE NEVER REFUSED PROVIDED DEFENDANT A DEPOSITION; TO DATE I AM HUNGRY-N-IN PAIN BECAUSE DEFENDANTS ARE ABUSING ME FOR MY ACTION IN GOOD FAITH IN ATTEMPTING TO GIVE A DEPOSITION. I'VE ALWAYS TRIED TO GIVE DEFENDANTS A DEPOSITION

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE-N-CORRECT PURSUANT TO 28 USC 1746, AND 18 PA. C.S. 4904. EXECUTED ON 4-21-13; AT SCI-GREENE, FD #80, 3-CELL; WAYNESBURG, PA., 175 PROGRESS DRIVE.

DATE: 4-21-13

L.R. 72.3, ORDER, 4-9-13; DECLARATION; 4:08-CV-1283

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"RESPECTFULLY SUBMITTED"
S/Henry Unsell Washington
HENRY UNSELL WASHINGTON
AM 3086 PRO SE